

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

EQUAL EMPLOYMENT OPPORTUNITY	)	
COMMISSION,	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No. 05-2122 DSD/SRN
	)	
KCD CONSTRUCTION, INC.,	)	
	)	
Defendant.	)	
_____	)	

**STIPULATION FOR PROTECTIVE ORDER**

It is hereby stipulated by the parties as follows:

1. There shall be no contact of any kind, including both verbal and written, between Kenneth Doeden, Dennis Doeden and Chad Doeden (“Doedens”), and the Charging Parties in this case during the pendency of this litigation. The Charging Parties are identified as Francis Soto, Javier Hernandez, Jose Antonio Hernandez, Humberto Bravo, Roberto Santos, Jose Rodriguez, William Morales, Joel Perez, Otonel Rivera and Efren Romero.
2. There shall be no contact between any agents of the Doedens, including KCD Construction employees who are asked to act on the Doedens’ behalf, with the Charging Parties during the pendency of this litigation.
3. Defendant will instruct KCD Construction employees, who have a social relationship with any of the Charging Parties, that they are prohibited from discussing the discrimination allegations, the EEOC charges, and the claims and/or defenses in this litigation.

4. The Doedens are prohibited from having any contact with the Charging Parties before, during or after depositions, except Kenneth Doeden who is the owner of KCD Construction, may be present in the deposition room during depositions.

**SO STIPULATED:**

Date: 4/19/06

s/Tina Burnside  
Tina Burnside (WI#1026965)  
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Date: 4/14/06

s/Stephen M. Thompson  
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